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National Heritage Areas Administrative History Project



**K. Lynn Berry**  
**February 7, 2017**

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My Narrative  
The Administrative History of the National Heritage Areas Coordinating Office

K. Lynn Berry  
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Interview conducted and transcribed by  
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I thought the heritage area program offered a good opportunity to put to work a background that kind of matched components of the program in community engagement and partnerships and historic preservation on a landscape scale. It was a job that fit my background. I worked in another agency in environmental planning and have a historic preservation background. I came to the NPS into the National Heritage Areas job.

**Heritage areas and NEPA:** Earlier heritage area studies and management plans had been all done with an environmental assessment level of documentation. Among the considerations was the development of a potential categorical exclusion or applying an appropriate categorical exclusion to future studies dependent on the level of analysis required under various topic headings. The end result (of the task force work) was that they would still follow a NEPA process. The process just now includes the application of categorical exclusion (CE) to planning documents heritage areas would be responsible for producing. That is NEPA, it's just not doing an environmental assessment or environmental impact statement. So, there would be a process of evaluating potential impacts, an abbreviated process, and if it was determined that there was no potential for adverse environmental impact and the proposed plan met the criteria of applicable categorical exclusion then a CE could be done. A lot of long-range planning documents that have no potential; you conduct a study, the findings of which would not result in any specific projects being approved, no groundbreaking projects would necessarily come forth from the plan and there are a large number of potential but unspecified activities. It was concluded that a long-range planning process could be categorically excluded because the nature of the plan was more of a strategic document. The plan was not that they were proposing a specific trail or a specific visitor center or something that could impact the environment.

Future actual projects that would be done by the heritage area or any of its sub-grant recipients would be subject to a NEPA analysis. It's entirely possible that certain projects, probably the majority of projects, still would not involve any impact to natural or cultural resources. Maybe even those downstream activities could be categorically excluded. Or some would require deeper analysis. The nature of heritage areas at the time I was working in the program, and I think still now, is that the vast majority of their work wasn't bricks and mortar kind of work. There was marketing to do or community meeting facilitation or website development.

**Administrative process guidance document:** I don't know precisely (why the guidance document is still in draft). I know that at the time the national program manager believed that there was still variation among the regions as to processes they wanted to follow, interpretation of the rules that their agreement officers had. It sounded like she was not interested in dictating and mandating a particular procedure but rather in continuing to honor the variable approaches that the regions had.

We had contracting officers on the team who somewhat consistently participated in the group calls to review and comment on drafts.

At the time that we developed the draft document we did say (in the Southeast Region) that we were adopting the administrative process guidance. The person that took my place, I don't know how often she referenced it.

**Roles of regional coordinators and Washington coordinating office related to heritage areas:** At one time, prior to my coming into the role there was actually a document that was produced at a coordinator's retreat that outlined different roles. I think we had some conversation about that once I was on board but didn't follow the document as a technical guide. Essentially it broke down to overall policy decisions and budget formulations and allocation of the appropriated funds and so forth were handled at WASO level. Individual cooperative agreements with the national heritage areas and subsequent requirements of that agreement including reporting and approval of annual work plans and monitoring of their costs to determine if they were allowable etc., those kinds of administrative functions resided in the regional offices. Relationally and project cooperation wise both the national office and the regional office played a part. In other words, heritage areas worked on some joint projects with the WASO office. Regions might get involved with helping on some projects as outlined in the plans. Relationships were forged and maintained at both levels.

For the Southeast Region there had probably been a hole in the provision of guidance over the years. There were interns and collateral duty folks working on it in the region prior to my arrival. Not a whole lot of attention, it seemed to me, paid to helping the heritage areas understand their requirements. As it happens, during my time there I did spend some significant amount of time on that type of work.

**Oversight of heritage areas:** Ideally, we would be involved with the creation of their annual work plan, helping to determine priorities. In practice we reviewed and approved those plans and had variable input on the actual content. The heritage areas had great latitude in determining their own course of action. In any event, if they produced a work plan, in order for it to meet with our approval it had to be consistent with their overall management plan and consistent with regulations pertaining to the expenditure of federal funds. So, we had a role in insuring that that was the case. We had a role in providing guidance and oversight on the manner in which and the details with which they reported their activities. That all became part of the effort we engaged to provide guidelines on administrative processes.

I felt, and I think others shared, that there were deficiencies in the level of detail that was reported to us and lack of clarity at times about precisely what the federal funds were going to. I think our role in the oversight was to improve the expenditure of the federal funds and to increase our participation in the development of their individual objectives related to their management plan. Following on to the management plan.

There were site visits. I think I averaged in a rotation visiting about three or four heritage areas a year. Not every heritage area got a site visit from someone from the region. Other ways of evaluating involved simply reviewing submittals, phone conversations about the submittals, some training for them, conference calls with them. It is kind of a mixture, but the on-site work was just a few heritage areas every year.

**Heritage area successes:** There were numerous. We had a lot of new heritage areas when I came on board so there was a considerable amount of effort for the new heritage areas and the regional office in producing early documents. Helping them get started, basically. A lot of achievements are in that realm for the new heritage areas. For the older heritage areas, there is everything from work on trails, to exhibits, supporting other local non-profit organizations to do similar work. A music trail in North Carolina, a different music trail in Alabama, it's just a long and broad list (of accomplishments). Just developing a long-range plan was an accomplishment for a start-up heritage area. Implementation once they had gotten their feet on the ground had many successes as well.

**Contribution of the heritage areas to the mission of NPS:** They help, in especially the latter half of the mission statement, where we talk about extending the benefits of conservation and preservation to communities. They help our reach beyond the boundaries of our parks in helping municipal, county, state and regional entities achieve their own conservation goals which is aligned with our own mission.

**NPS benefit to the heritage areas:** I think it could be more (of a benefit) if we could get past and make more routine the understanding and information about requirements and reporting. Sort of getting all that out of the way so that everyone is doing that as a matter of routine and everyone understands it, and not struggling against the requirements. That would free up a lot more opportunity for partnership of a more well-rounded nature. I think it would also be beneficial if the NPS had enough staffing to support the ranges of technical assistance that could be provided. Details about historic preservation or non-profit board governance or processes for doing environmental work or section 106 of the National Historic Preservation Act. There is a lot more technical assistance that would be highly desirable for them if we could provide it.

**Important criteria for successful heritage area:** Communication and connectivity within their communities. The Conservation Study Institute in 2009 or 2010 did the early evaluations of heritage areas in the Northeast Region. They identified those heritage areas as hubs within their communities. They even diagramed it with a pretty nifty graphic that mapped all the connections between the outlying partners and community organizations and the heritage area often being in the center or close to the center as a hub and facilitator of the connections. When heritage areas are fully integrated like that, and serving as a hub, I think they stand the best chance of being able to produce outcomes in their area.

A capacity for and understanding of a non-profit management structure and board governance is important. The most successful heritage areas had a strong board and followed good board governance processes. Those that struggled were just green in that area, I thought, and had haphazard and a loose consortium of folks working with them to achieve their goals. That kind of strong structure is required.

Technical expertise in several areas is needed to successfully conserve or preserve. Different heritage areas, in my experience, had different kinds of expertise. There weren't any in the Southeast Region that were big enough or had enough staff to cover the whole gamete. One heritage area might be really good at basic marketing and promotion. Another heritage area might be good at history or historic preservation or interpretation. Because most of them were

pretty small organizations it was hard for them to succeed in all those realms. They had to pick the one or two things they were going to be good at and what services they were going to provide their communities and partner organizations.

So, I guess the criteria for real success is both the breadth of knowledge in each of those categories and hopefully a little depth and technical expertise in a handful of them.

**NPS attitude toward the heritage areas:** At the time I was in the program, I would say the program enjoyed really positive support from the director of the NPS, from the associate director of cultural resources, and, in my case, from our regional director and the associate regional director who oversaw the program. Many of the park superintendents in our region had a generic appreciation for heritage areas. Very few were active detractors or worked to diminish the program. At the same time, very few were advocates for the program. There were a handful of park superintendents, of course, who served as a liaison to more than one heritage area. So, let's say, nine or ten superintendents who were closely involved because they served as a liaison. And of those nine or ten, six or seven were pretty positive and helpful. Others were less so. Beyond those that had a reason to be actively involved there was just high-level support. Beyond administrators and a few superintendents, most of the regional staff had little or very little understanding of what the heritage areas program was or how it might benefit the park service or help their mission.

**Challenges:** It was a challenge to focus on increased accountability for the heritage areas themselves and to strengthen our oversight of their reporting and other requirements. Some things are new and can be challenging.

I think we faced a challenge as a group of coordinators in coalescing and agreeing to a standard approach and that certainly was reflected in the administrative process effort. But I think it was true beyond that as well. There was a tendency in history of each region acting autonomously and a reluctance to make any changes that would get us more aligned. The reluctance wasn't always based on an unwillingness or complete lack of desire to be aligned. Sometimes it had to do with internal processes at the region that made changing each individual's own approach difficult. The regional approaches were very well entrenched.